

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 3:14-Cr-293-M
	§	ECF
JOHN WILEY PRICE (1)	§	

MOTION FOR AUTHORIZATION TO TRAVEL

Defendant PRICE, through counsel, requests the Court's authorization to travel to Tulsa, Oklahoma on Saturday, August 6, 2016 as part of a delegation from Dallas attending the funeral of the mother of Vernetta Kinnards. This request is necessary in light of a condition of pretrial release which confines the Defendant's travel to the State of Texas. Doc. 9. The delegation will depart by bus at 6:00 a.m. on Saturday August 6th and will return the same evening. It is a 5-hour trip each way. It is at least possible that the return trip could cross back into Texas from Oklahoma after midnight and therefore the Defendant requests authorization for travel August 6-7, 2016 outside the State of Texas for attendance at this funeral in Tulsa, Oklahoma.

It is respectfully submitted that the Defendant's motion for authorization to travel should be granted.

Respectfully submitted,

Shirley Baccus-Lobel

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CERTIFICATE OF CONFERENCE

I conferred with government counsel, Walt Junker, and the prosecution does not object to this motion.

/s/ Shirley Baccus-Lobel

SHIRLEY BACCUS-LOBEL

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically submitted to the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. The electronic case files system sent a "Notice of Electronic Filing" to the following individuals who have consented in writing to accept this Notice as service of this document by electronic means: AUSA's Walt, Katherine Miller, and Nick Bunch 3rd Floor, 1100 Commerce, Dallas, Texas 75242, and all counsel of record.

/s/ Shirley Baccus-Lobel

SHIRLEY BACCUS-LOBEL